STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30028
LANSING, MI 48909

DAVID F. HALES, Director

February 6, 1989

Mr. William Guerrera
Corporate Environmental Specialist
The Stanley Works
New Britain, Connecticut 06050

Dear Mr. Guerrera:

SUBJECT: Annual Groundwater Report MID 099 124 299 (Fowlerville, MI)

Your facility is listed as a Land Disposal Facility and as such is regulated under Michigan Act 64, P.A. 1979, as amended, and the Federal Resource Conservation and Recovery Act (RCRA) regulations. This letter is a reminder that the annual groundwater report required under 40 CFR 265.94(a)(2)ii-iii and 265.94(b)(2) for 1987 is due March 1, 1988. Please send the report to:

H.W. Geotechnical Support Unit
Waste Management Division
Michigan Department of Natural Resources
P.O. Box 30241
Lansing, Michigan 48909

If it is your company's position that an annual report is not required, please respond with a letter stating the reason. The Waste Management Division will then confirm and update our files, or notify you if we need more information or disagree.

If there are any questions, please contact me.

Sincerely,

David Slayton

David Slayton
Waste Management Division
517-373-2730

cc: C & E File
De Montgomery/Geotech File
District Office

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30028
LANSING, MI 48909

DAVID F. HALES, Director

January 4, 1989

Mr. William J. Guerrera
Corp. Environmental Specialist
The Stanley Works
1000 Stanley Drive
New Britain, CT 06050

Dear Mr. Guerrera:

Subject: Stanley Tools Plant
MID 099 124 299
Fowlerville, Michigan

The Michigan Department of Natural Resources (MDNR) is an authorized state for implementing RCRA hazardous waste regulations. This includes conducting Comprehensive Monitoring Evaluations (CME) at RCRA regulated facilities pursuant to Act 64, P.A. 1979, as amended, Part 10, Rule 299.11003(n). This rule references Part 265, Subpart F of RCRA. A CME is a detailed evaluation of the adequacy of the design and operation of groundwater monitoring systems at regulated facilities.

The facility is in the process of closing regulated impoundments, while at the same time conducting a RCRA facility investigation (RFI) under the consent order that took effect September 6, 1988, under Section 3008(h) of RCRA. The facility has been in groundwater assessment under Part 265, Subpart F, doing quarterly sampling of designated wells. Previous data submittals from you have mentioned that the consent order would supersede the assessment monitoring when it took effect.

Since the RCRA regulated units have not been certified closed, the interim status groundwater monitoring must continue on a quarterly basis. The Fowlerville facility is scheduled to have a CME conducted by MDNR during the second quarter of fiscal year 1989. The CME consists of two separate inspections to include the following:

Part 1. A determination of the compliance status and technical adequacy of your facility's groundwater monitoring system with regard to the requirements of 40 CFR 265.93. This portion of the inspection will consist of completing the ERTEC checklist (copy attached), review of hydrogeological findings, and auditing your statistical analysis.

Part 2. A review of the groundwater sampling and analysis plan with regard to 40 CFR 265.92(a). This audit will include an evaluation of the adequacy of the sampling and analysis plan and an evaluation of analytical data records. Adherence to this plan during field implementation will also be evaluated. This includes independent static water measurements and split sampling of selected wells during a regularly scheduled facility sampling.

Therefore, I would like to start making arrangements with you to conduct a split sampling of groundwater at a regularly scheduled sampling event. In order to allow a pre-inspection review, please let me know what current sampling and analysis plan is being used so I can retrieve it from our files, or request a copy from you.

I understand that new monitoring wells are going to be installed as part of the RFI. Once these wells are installed, we would be willing to discuss which wells are appropriate to use for the assessment monitoring, the old wells or newer ones. The RFI will provide a great deal of information in regards to groundwater conditions, and we are willing to coordinate the activities as much as possible between the RFI and routine assessment monitoring. We must, however, continue assessment monitoring until closure of the regulated units is certified.

If you have any questions concerning the CME, please contact me.

Sincerely,

David Slayton

David Slayton
Geologist Waste Management Division
517-373-8012

Attachment
cc: Mr. Robert Basch, DNR
Ms. Jan Sealock, DNR
Geotech File
C&E File

STANLEY

S T A N L E Y T O O L S

DIVISION OF THE STANLEY WORKS

425 FRANK STREET, P. O. BOX 829, FOWLERVILLE, MICHIGAN 48836

(517) 223-9154

HWEB
RECEIVED
MAY 13 1985

May 8, 1985

Mr. Ronald Kolzow
U.S.E.P.A.
Region V
230 South Dearborn
Chicago, Ill. 60604

Dear Sir:

Enclosed is a copy of the analysis of the samples taken on April 4, 1985. These samples were analyzed for the elements as required in the revised groundwater assessment plan. This sampling completes the four quarters of sampling for the 1984-1985 year.

I have also forwarded a copy to the Michigan Hazardous Waste Department for their files and to keep them current as to the progress of the groundwater monitoring program at this facility.

Should you have any questions or comments please contact me. Phone (517) 223-9154.

Sincerely,

A. M. Stock
Mgr. Plt. Eng. and Envir. Cntrl.

AMS/alk

Enc.

ANALYTICAL REPORT

Project: A2900
Report Date: 04-23-85

ENVIRONMENTAL RESEARCH GROUP, INC.
117 N. FIRST
ANN ARBOR, MICHIGAN 48104 (313) 662-3104

Client P.O 824182
Report: 13175

Samples Recvd: 04-05-85
Refer Questions To:
CAROLYN SCHNEIDER

Client:
STANLEY TOOLS DIVISION
425 FRANK STREET
FOWLERVILLE, MI 48836
Attention: MIKE STOCK

Approved: Barbara Jacobus

***
Residual Samples Will Be Held
TWO WEEKS
***

Client I.D.: OW 2
ERG Sample No.: 04/127726
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, TOTAL	ND (0.01)	mg/L
CHROMIUM, TOTAL	<0.02	mg/L
SPECIFIC CONDUCTANCE	1000	umho/cm
COPPER, TOTAL	0.04	mg/L
CYANIDE, TOTAL	ND (0.01)	mg/L
NICKEL, TOTAL	0.24	mg/L
ZINC	9.3	mg/L
pH	7.7	S.U.

Client I.D.: OW 5
ERG Sample No.: 04/127727
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, TOTAL	<0.01	mg/L
CHROMIUM, TOTAL	<0.02	mg/L
SPECIFIC CONDUCTANCE	1200	umho/cm
COPPER, TOTAL	0.03	mg/L
CYANIDE, TOTAL	<0.01	mg/L
NICKEL, TOTAL	0.08	mg/L
ZINC	3.6	mg/L
pH	8.7	S.U.

Client I.D.: OW 7 (UPGRADIENT)
ERG Sample No.: 04/127728
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, TOTAL	<0.01	mg/L
CHROMIUM, TOTAL	<0.02	mg/L
SPECIFIC CONDUCTANCE	2000	umho/cm
COPPER, TOTAL	0.04	mg/L
CYANIDE, TOTAL	ND (0.01)	mg/L
NICKEL, TOTAL	0.05	mg/L

See last page for explanation of symbols.

Client I.D.: OW 7 (UPGRADIENT)
ERG Sample No.: 04/127728
Matrix: NATURAL WATER

Parameter	Result	Units
ZINC	5.2	mg/L
pH	8.2	S.U.

Client I.D.: OW 9 S
ERG Sample No.: 04/127729
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, TOTAL	<0.01	mg/L
CHROMIUM, TOTAL	<0.02	mg/L
SPECIFIC CONDUCTANCE	2800	umho/cm
COPPER, TOTAL	0.04	mg/L
CYANIDE, TOTAL	0.04	mg/L
NICKEL, TOTAL	0.09	mg/L
ZINC	3.3	mg/L
pH	9.2	S.U.

Client I.D.: OW 10 S
ERG Sample No.: 04/127730
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, TOTAL	<0.01	mg/L
CHROMIUM, TOTAL	<0.02	mg/L
SPECIFIC CONDUCTANCE	1900	umho/cm
COPPER, TOTAL	0.03	mg/L
CYANIDE, TOTAL	0.03	mg/L
NICKEL, TOTAL	<0.05	mg/L
ZINC	10	mg/L
pH	8.6	S.U.

Client I.D.: OW 12 S
ERG Sample No.: 04/127731
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, TOTAL	ND (0.01)	mg/L
CHROMIUM, TOTAL	<0.02	mg/L
SPECIFIC CONDUCTANCE	2400	umho/cm
COPPER, TOTAL	0.03	mg/L
CYANIDE, TOTAL	<0.01	mg/L
NICKEL, TOTAL	0.05	mg/L
ZINC	4.6	mg/L
pH	7.1	S.U.

See last page for explanation of symbols.

ANALYTICAL REPORT

ENVIRONMENTAL RESEARCH GROUP, INC.

Project: A2900
Report Date: 04-23-85

Client I.D.: UPSTREAM
ERG Sample No.: 04/127732
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, TOTAL	ND (0.01)	mg/L
CHROMIUM, TOTAL	<0.02	mg/L
SPECIFIC CONDUCTANCE	590	umho/cm
COPPER, TOTAL	0.02	mg/L
CYANIDE, TOTAL	ND (0.01)	mg/L
NICKEL, TOTAL	<0.05	mg/L
ZINC	<0.02	mg/L
pH	7.7	S.U.

Client I.D.: DOWNSTREAM
ERG Sample No.: 04/127733
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, TOTAL	ND (0.01)	mg/L
CHROMIUM, TOTAL	<0.02	mg/L
SPECIFIC CONDUCTANCE	600	umho/cm
COPPER, TOTAL	<0.02	mg/L
CYANIDE, TOTAL	ND (0.01)	mg/L
NICKEL, TOTAL	<0.05	mg/L
ZINC	<0.02	mg/L
pH	7.7	S.U.

Client I.D.: OW 11 S
ERG Sample No.: 04/127734
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, TOTAL	ND (0.01)	mg/L
CHROMIUM, TOTAL	<0.02	mg/L
SPECIFIC CONDUCTANCE	2400	umho/cm
COPPER, TOTAL	0.02	mg/L
CYANIDE, TOTAL	<0.01	mg/L
NICKEL, TOTAL	0.14	mg/L
ZINC	12	mg/L
pH	6.9	S.U.

SD-Sample damaged
SR-See field report for result
SR-See attached report
NA-Result not applicable to test

ND-Nondetected, Detection limit in ()
<-Positive result at an unquantifiable concentration below indicated level

Thank you for your business.

QUALITY CONTROL REPORT
DUPLICATE AND MATRIX SPIKE ANALYSIS
QUANEX - Michigan Seamless A2895

	DUPLICATE			MATRIX SPIKE		
PARAMETER	Sample A	Sample B	Relative Difference	Spiked Sample	Spike Added	Percent Recovery
	mg/L	mg/L	%	mg/L	mg/L	%
pH*	7.2	7.2	0	---	---	---
Specific Conductance**	2200	2200	0	2200	2060	107
Total Organic Carbon	5.0	5.1	2.0	23	20	90
Total Organic Halogens	90	80	12	69	60	115
	170	140	19	---	---	---

This QC report covers the following sample numbers: 127664-127679

*standard units

**units are umho/cm.

QUALITY CONTROL REPORT

DUPLICATE AND MATRIX SPIKE ANALYSIS:

Stanley Tool A2900

Parameter	DUPLICATE Sample Result A	DUPLICATE Result B	DUPLICATE Relative Percent Difference	MATRIX SPIKE Spiked Sample Results	MATRIX SPIKE Spike Added	MATRIX SPIKE Percent Recovery
	(mg/L)	(mg/L)		mg/L	mg/L	
Cadmium	<0.01	< 0.01	0	0.02	0.02	100
Chromium	0.01	0.01	0	0.05	0.05	80
Copper	<0.02	< 0.02	0	0.05	0.05	100
Nickel	0.09	0.08	12	0.18	0.10	100
Zinc	0.07	0.07	0	0.12	0.05	100
*pH	7.7	7.7	0	---	---	---
**Specific Conductance	2800	2800	0	---	---	---
Total Cyanide	<0.01	<0.01	0	0.19	0.20	95

This QC Report also covers the following sample numbers: 127726-127734

*Result reported in Standard Units.

**Result reported in Umho/cm.

ENVIRONMENTAL RESEARCH GROUP, INC.

INTERNAL SAMPLE CONTROL RECORD

PART I Movement of samples during analysis.

FOR SAMPLE CUSTODIAN:

Signature

Storage Area

FOR DOCUMENT CUSTODIAN:

Signature

Document Control No.

PROJECT NUMBER A9900 PROJECT NAME Stanley Tool

SAMPLE NUMBERS	PARAMETERS	ANALYST'S SIGNATURE	OUT:DATE/TIME	IN:DATE/TIME
127726-127734	FLAME METALS	Cindy Heeb	4/16/85 11:28AM	4/16/85 14:54
127726-127734	CN	Mike Depa	4/16/85 12:41	4/16/85 17:10
127734	CN	Mike Depa	4/18/85 14:20	4/18 17:20
127726-127734	Spec Cn	Mahtab Wood	4/22/85 10:21	4/22/85 13:36

Field Methodology
Quarterly Ground Water Monitoring
Stanley Tool Co.
Fowlerville, Michigan

Introduction

On April 4 and 5, 1985, Environmental Research Group, Inc. conducted the quarterly groundwater monitoring program at Stanley Tool Company in Fowlerville, Michigan. A total of seven monitoring wells were purged and sampled during this program. On April 4, 1985, wells OW-5 shallow, OW-7 upgradient, OW-9 shallow, OW-10 shallow, OW-11 shallow and OW-12 shallow were purged and sampled. Wells OW-5, OW-7, OW-9, OW-10 and OW-2 were evacuated to dryness and allowed to recover prior to sample collection. Well OW-2 had not recovered sufficiently to allow sample collection so it was again evacuated to dryness, allowed to recover overnight and sampled on April 5, 1985. Wells OW-11s and OW-12s, which exhibit moderate recovery rates, were periodically evacuated prior to sample collection.

In addition to the above mentioned wells, two surface water samples were collected from the Red Cedar River. Grab samples were collected from upstream and downstream of Stanley Tool's property. For all on-site data and observations, refer to the attached data sheets.

Sampling Methodology

Prior to purging each well, a static water level measurement was taken using a specific conductivity meter with a graduated (0.01') probe line. By subtracting the static water level from the total well depth, the volume of standing water was calculated for each well. Wells were purged using a peristaltic pump equipped with new silicon pump tubing and teflon sample line.

To avoid cross-contamination between wells, one gallon of deionized water was pumped through the sampling train and discarded between wells. Sample collection at each well was conducted utilizing a teflon bailer. Prior to sample collection at each well, the bailer was thoroughly rinsed with deionized water followed by a rinse with sample water.

Sample water was transferred directly from the bailer into properly preserved containers. Grab samples from the two river stations were collected directly into the sample containers. All sample preservation was in accordance with the December 3, 1979 Federal Register. Immediately after sample collection, the samples were placed on ice within a cooler for transport to ERG's Ann Arbor laboratory.

An Orion Model 407A meter was used to measure pH on-site within the two-hour holding time. The meter was calibrated before and after each measurement using two buffers (7&10) to insure meter linearity. Final measurements for specific conductance were made by ERG's Ann Arbor laboratory.

Grab samples for quadruplicate analyses were also collected from the Red Cedar River. Samples were collected from approximately mid-stream and at mid-depth. Refer to Table I for on-site river measurements.

Measurements for pH were made using an Orion 404 pH meter, calibrated for linearity before and after each measurement, using pH buffers 7 and 10. Specific conductance measurements were taken utilyzing a YSI Model 54 S-C-T Meter. Refer to attached well data sheets for on-site measurements and observations.

STANLEY

S T A N L E Y T O O L S

DIVISION OF THE STANLEY WORKS
425 FRANK STREET, P. O. BOX 829, FOWLERVILLE, MICHIGAN 48836
(517) 223-9154

August 17, 1983

Mr. Valdas Adamkus
EPA Region V
230 South Dearborn
Chicago, Ill. 60604

MID 099 124 299
PA, GW, TRS, TSD

Dear Mr. Adamkus:

Enclosed is a copy of Stanley Tools Division Fowlerville Plant's Ground Water Quality Assessment Plan which was referred to in our letter of August 4, 1983 to you.

This plan was prepared for Stanley Tools Division by Keck Consultants located in Williamston, Michigan who are certified in the field of geology.

As stated in the plan we are prepared to implement the Groundwater Quality Assessment Plan in October 1983, however, we would ask, if possible, to have Region V EPA review and we trust approve the plan prior to the October 1983 date. Should a reply not be forthcoming from the E.P.A., it is Stanley Tools Division intentions to comply to the October 1983 implementation date.

Sincerely,

STANLEY TOOLS DIVISION
FOWLERVILLE PLANT

A. M. Stock
Mgr. of Plt. Eng. & Envir. Control
/alk

Enc.

STANLEY

THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

July 11, 1987

Mr. David Slayton
Michigan Department of Natural Resources
Waste Management Division
Ottowa Street Building, South Tower
P.O. Box 30028
Lansing, Michigan 48909

Dear David,

Enclosed please find an Annual Groundwater Report on the groundwater assessment program currently in place at Stanley Tools, Fowlerville as required by 40 CFR 265.94(b).

Since Stanley is involved in a 3000(h) Administrative Consent Order process, we anticipate addressing the groundwater issues within the context of our work plan. We have signed a contract with Dames & Moore to assist us in this work and look forward to working with you as the Remedial Investigation progresses.

If you have have questions, please feel free to call me at The Stanley Works.

Sincerely,

Delia M Christensen

Delia M. Christensen
Manager, Loss Control

CC J. Baker, EPA Region 5
D. Darrah
D. Kuhnke
S. Weddle

Joe Baker
Reg. V EPA

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

~~RONALD O. SKOOG, Director~~
XXXXXXXXXXXXXXXXX
Gordon E. Guyer, Director

June 3, 1987

Ms. Delia M. Christensen
Manager, Loss Control
The Stanley Works
New Britain, Connecticut 06050

RE: Annual Groundwater Report
Fowlerville Facility
MID 099 124 299

Dear Ms. Christensen:

Thank you for your prompt response, by the May 19, 1987 letter, regarding our telephone discussions of the requirements for an annual report as per 265.94(b). Since our conversation, I have discussed the situation with other staff, and the conclusion is that Stanley needs to submit an annual report on the groundwater assessment program currently in place as required by 40 CFR 265.94(b). Until such time the consent agreement being negotiated is signed, it will not supersede the ongoing assessment requirements. In order to satisfy the requirements, please submit an assessment report by July 17, 1987.

If you have questions, please contact me.

Sincerely,

David Slayton

David Slayton
Waste Management Division
517-373-2730

cc: C&E File
Lansing WMD District
Ms. De Montgomery/Geotech File
Mr. Joe Baker, Region V EPA

STANLEY

THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

May 20, 1987

Mr. David Slayton
Michigan Department of Natural Resources
Waste Management Division
Ottawa Street Building, South Tower
P.O. Box 30028
Lansing MI 48909

Dear David:

Enclosed please find the groundwater monitoring results for Stanley Tools - Fowlerville from April, 1987.

I would appreciate a copy of your results from the January split sample for comparison with ours.

Thank for your cooperation in this matter.

Sincerely,

Dee Christensen/jek

Delia M. Christensen
Manager
Loss Control

DMC:jek

Enc.

cc: Dotz Darrah
Ron Kozlow -EPAS

STANLEY

S T A N L E Y T O O L S

DIVISION OF THE STANLEY WORKS
425 FRANK STREET, P. O. BOX 829, FOWLERVILLE, MICHIGAN 48836
(517) 223-9154

RECEIVED
FEB 10 1986
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

February 5, 1986

Mr. Ronald Kolsow
USEPA
Region V
230 South Dearborn
Chicago, Ill. 60604

Dear Sir:

Enclosed is the report containing the analysis of the groundwater samples taken on January 2 and 3, 1986. These samples are for the third quarter 1985-1986.

As you will note there is no information for monitoring well OW-7 which was the background well. It became necessary to remove this well during the excavation and removal of the storage impoundments.

I have forwarded a copy to the Michigan Hazardous Waste Department for their perusal.

Should you have any questions or comments please contact me.

Sincerely,

A. M. Stock
A. M. Stock
Manufacturing Manager

AMS/alk

Enc.

759 - dry at less than 1 gallon

58

— WORK SAFELY WITH HAND TOOLS — WEAR SAFETY GOGGLES —

STANLEY

THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

December 6, 1985

Mr. J. Baker, Geologist
U.S. EPA - MI/WI Unit
230 South Dearborn Street
Chicago, IL 60604

Re: Stanley Tools
MID 099124299
Groundwater Assessment Report

Dear Mr. Baker:

With reference to our phone conversation, the additional information necessary to complete the requirements of the Letter of Warning is still in progress.

Stanley Tools desires to fulfill all of its obligations with reference to this issue. I am making every effort to expedite the completion of the report with respect to the unanswered questions and respectfully request additional time for completion. As soon as I can target a completion date I will be in touch with your office.

Thank you for your cooperation.

Sincerely,

THE STANLEY WORKS

Delia M Christensen

Delia M. Christensen
Stanley Laboratory
1309 Corbin Avenue
New Britain, CT 06053

dw

STANLEY

S T A N L E Y T O O L S

DIVISION OF THE STANLEY WORKS

425 FRANK STREET, P. O. BOX 829, FOWLERVILLE, MICHIGAN 48836

(517) 223-9154

December 5, 1985

Mr. Ronald Kolsow
USEPA
Region V
230 South Dearborn
Chicago, Ill. 60604

Dear Sir:

Enclosed is the report containing the analysis of the groundwater samples taken on October 10 and 11, 1985. These samples are for the second quarter of 1985-1986.

I have forwarded a copy to the Michigan Hazardous Waste Department for their perusal.

Should you have any questions or comments please contact me.

Sincerely,

A. M. Stock

A. M. Stock
Mgr. Plant Eng. Envir. Cntrl.

AMS/alk

Enc.

D
Delia Christensen
Stanley Laboratory
1309 Corbin Ave
New Britain Conn. 06053

5HE-12

SEP 18 1985

Mr. A.M. Stock
Stanley Tools
425 Frank Street
P.O. Box 829
Fowlerville, Michigan

Re: Letter of Warning
Stanley Tools
Fowlerville Facility
MID 099 124 299

Dear Mr. Stock:

The United States Environmental Protection Agency (U.S. EPA), Region V, has reviewed your March 1985 groundwater assessment report dated February 28, 1985, and upon further review identified areas of concern.

Title 40 of the Code of Federal Regulations (CFR) 265.93(d)(4)(i) and (ii) state that the owner or operator must implement a groundwater quality assessment plan which at a minimum will determine the rate, extent and concentration of hazardous wastes or hazardous waste constituents in the groundwater.

Review of a groundwater assessment report dated February 2, 1985, in conjunction with a review of said report by David Slayton of the Michigan Department of Natural Resources (MDNR) dated March 25, 1985, indicate the above regulations are not being met.

(1) The report notes the presence of elevated metals in the groundwater and suggests causes, but proposes no study to confirm or deny their origin. Such a study should be performed. Metal concentration variabilities noted in the report were stated as not indicative of a "plume" and that data could not be explained by discrete "slugs" of contaminents. A MDNR review of your assessment report by Dave Slayton dated March 25, 1985, states that slugs can account for the given results. Reasons include: (1) Seasonal variations in precipitation; (2) fluctuating river levels; (3) complexities in subsurface glacial geology and; (4) location and age variabilities of possible contaminent sources.

(2) Elevated zinc values in monitoring wells should be addressed with respect to possible contamination by galvanized steel well casings. If casing contamination is determined, sampling modifications must be made (e.g., replace casings or drill new wells).

(3) "Silt rich" samples with elevated chromium levels (well #2) should be filtered to determine if solids are responsible for the high readings.

(4) Please submit exact locations of Red Cedar River water samples.

(5) Significant increases in Total Organic Carbon (TOC), Total Organic Halogen (TOX) and pH, that originally triggered the assessment, were not addressed in the report. Samples by MDNR of groundwater in monitor wells 5, 7, 9 and 12 on September 8, 1984, denoted TOC contamination in at least two (2) of the wells. While not assessment parameters, an addition to the report should address these contaminents and include causes for increases as well as possible sources.

Requested information should be submitted to U.S. EPA no later than 30 days after receipt of this correspondence.

Please address all replies of this Letter of Warning to:

United States Environmental Protection Agency
RCRA Enforcement Section 5HE-12
230 South Dearborn Street
Chicago, Illinois 60604

A copy of this information should also be sent to:

Michigan Department of Natural Resources
Attention: David Slayton
P.O. Box 30028
Lansing, Michigan 48909

This letter only addresses our findings with respect to your facility's groundwater monitoring reports. Compliance with this notice does not limit the applicability of other provisions of RCRA regulations.

Please contact Joe Baker of my staff at (312) 886-4592, if you have any questions regarding this matter.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Section

cc: David Slayton, MDNR

5HE-12:JBAKER:bp:6-4592:9-10-85

	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SEC'Y	SECT. CHIEF	HWEB [illegible]	WMD DIR
INIT. DATE	B. P. 9/12/85	J. B 9-12-85		R K 9-16-85	AP 9-17-85	WEM 9-17-85		

STANLEY

S T A N L E Y T O O L S

DIVISION OF THE STANLEY WORKS

425 FRANK STREET, P. O. BOX 829, FOWLERVILLE, MICHIGAN 48836

(517) 223-9154

August 14, 1985

Mr. Ronald Kolzon
USEPA
Region V
230 South Dearborn
Chicago, Ill. 60604

Dear Sir:

Enclosed is the report containing the analysis of the groundwater samples taken on July 9 and 10, 1985. These samples are for the first quarter of 1985-86.

I have also forwarded a copy to the Michigan Hazardous Waste Department for their perusal in order to keep them informed of our progress relative to groundwater monitoring.

Should you have any questions or comments please contact me. (517) 223-9154.

Sincerely,

A. M. Stock
Mgr. Plant & Envir. Cntrl.

AMS/alk

Enc.

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

March 25, 1985

Ms. Edith Ardiente, Chief
Technical, Permits, and Compliance Section
Waste Management Division
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Re: Stanley Tools Division
MID 099124299
Groundwater Assessment Report
Dated February 27, 1985

Dear Ms. Ardiente:

The Hazardous Waste Division of the Michigan Department of Natural Resources has reviewed the Groundwater Assessment Report (dated February 27, 1985) submitted by Stanley Tools Division of Fowlerville. This report was received March 4, 1985, directly from the company. Enclosed are the comments of David Slayton (Geologist), who reviewed the report. If there are any questions or comments on the review, please contact us.

Sincerely,

Alan J. Howard

Alan J. Howard, Chief
Technical Services Section
Hazardous Waste Division
517-373-2730

Enclosure
cc: J. Bohunsky/B. Basch
A. Howard/K. Burda
Geotech. Subunit Files
D. Roycraft, SAS, GQD

Stanley Tools, Fowlerville
MID 099124299
Groundwater Assessment Report

David Slayton
Hazardous Waste Division
Michigan Department of
Natural Resources

March 22, 1985

Hazardous Waste Division Review Comments

1. Statistically significant increases in some of the indicator parameters under RCRA Interim Status monitoring required the implementation of an assessment study. The original study plan proposed to sample for indicator parameters only. The plan was submitted and implemented although HWD/MDNR had no record of EPA approval. In conversations with Region V EPA, HWD/MDNR recommended, in March 1984, that heavy metals be added to the sampling program, and the suggestion was agreed to be appropriate. However, the revised Assessment Plan (6/15/84) submitted to EPA and approved (EPA letter of 6/28/84), should not have been accepted since it did not include continued sampling of indicator parameters (pH, specific conductance, TOC, TOX).

2. The Assessment Report does not address the increase in indicator parameters. The first 2 samplings under the original plan (10/83, 1/84) sampled only for indicators. The Keck Consulting Services, Inc., report (dated 4/13/84) on January 1984 sampling concludes that significantly higher levels of TOC and TOX were detected in several wells.

The Assessment Report (2/27/85) is based on the revised plan with 3 samplings (7/84, 10/84, 1/85), and analyzed only for metals. Although the Final Report (2/27/85) mentions the increase in TOX and TOC, it fails to address what caused the increase (i.e. what specific chemicals are involved), or what the source was.

3. For the metals considered in the final report (cadmium, chromium, copper, cyanide, nickel, zinc), the report basically concludes that since the contamination locations and concentrations vary, there is no plume of contamination between the ponds and the river. The report in numerous places notes the presence of elevated metals in the groundwater, but since there is no "discernible" pattern it claims there is "no problem". This is contradictory and arbitrary. When the report suggests causes for variations in the levels of metals, they do not propose a study for confirmation. It is my contention that these conclusions are not valid, and at the least, unsubstantiated.

4. With regard to organic chemical contamination, the assessment report does not address the increases in TOX and TOC that originally triggered the assessment study, and that was identified in the October 1983 and January 1984 original assessment plan samplings. As well, the Hazardous Waste Division of the DNR independently sampled monitor wells 5, 7, 9, and 12 on September 18, 1984. This

DNR sampling identified organic chemicals in at least two of those wells (MW-5 had 17 ug/l of 1,1-Dichloroethane; 1100 ug/l of 1,2-Dichloroethane; and 29 ug/l of TCE for example). Contamination of groundwater with organic chemicals should have been addressed.

5. The report contends the variability of concentrations of metals in the groundwater indicates there is no "plume", and that the variability in data cannot be explained by discreet "slugs" of contaminants moving through the aquifer. These concentration variations can indeed be explained by slugs of contaminants for several reasons. One, this report itself notes that fluctuating river levels impact groundwater flow direction. If flow toward the river is slowed down or "backed up" by high river levels, that could cause slugs of contaminants to be detected at wells. Additionally, seasonal variations of precipitation very commonly leach slugs of contaminants into groundwater where a source exists. At this site there are numerous active and inactive sources of contaminated soils or sludges. The location of these sources in relation to the wells could easily cause the well to well variation in types and concentrations of contaminants. Ruling out slugs of contaminants has no factual basis as provided by this report.

   If the variability of some metals, as suggested in this summary report, is due to the presence of silt in the sample, steps should have been taken to field filter the samples. The exact sampling procedure and preservation process was not explained.

6. The conclusions of the February 27, 1985, report are woefully inadequate. The report does not deal with potential problems identified such as faulty well construction, or propose a study to determine the source of the elevated metal concentrations in the groundwater. This report did not identify the source or sources of contaminants, or propose to prove or disprove its hypotheses, or replace the possibly faulty well.

   The report also does not recommend what the future groundwater monitoring should be. Depending on whether or not hazardous constituents are detected in groundwater, the company must either reinstitute the regular detection monitoring program [265.93(d)(6)] or continue the assessment plan [265.93(d)(7)].

7. It is my opinion that there has been a release of contaminants to the environment. Specifically, groundwater is contaminated with heavy metals and organic chemicals. Given the November 1984 RCRA amendments, it makes no difference what the source is. There have also been surface water studies conducted on the adjacent Red Cedar River showing definite impacts on macroinvertebrates and sediments (PCB's, heavy metals). That same study also identified some contaminated soils at the river bank. It is hereby recommended that this facility be placed on the "Prior Release" notification list.

This site is probably best addressed now in the Part B application and permitting process. There needs to be corrective action taken at this facility to, at a minimum, identify the extent of all sources of contaminants (old lagoons, soils, etc.), and to stop their introduction to the environment by removal or encapsulation.

cc: C. Riley

5HE-12JCK

12 MAR 1985

Mr. A.M. Stock
Manager Plant Engineering
and Environmental Control
Stanley Tools
425 Frank Street
P.O. Box 829
Fowlerville, Michigan 48836

Re: Groundwater Assessment Report
MID 099 124 299

Dear Mr. Stock:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the annual groundwater quality assessment report for Stanley Tools Division Fowlerville Plant dated February 27, 1985. The report indicates that the facility resampled its wells for those hazardous waste constituents managed at the facility and found that the concentrations of chromium and zinc (Michigan hazardous constituent) exceeded the National Interim Primary Drinking Water Standard and the National Secondary Drinking Water Standard, respectively. U.S. EPA looks forward to your continuing progress in the determination of the origin of the hazardous waste constituents in the groundwater.

Your continued cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Mr. Ronald Kolzow of my staff at (312) 886-4445.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Section

cc: Alan J. Howard, MDNR

bcc: Richard Traub, 5HS-13
5HE-12JCK:RKOLZOW:mholman:6-4445:3-7-85

	TYPIST	AUTHOR	~~STU #1~~ CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	MH	RK						
DATE	3-11-85	3-11-85	3/12 WEM					

STANLEY

S T A N L E Y T O O L S

DIVISION OF THE STANLEY WORKS
425 FRANK STREET, P. O. BOX 829, FOWLERVILLE, MICHIGAN 48836
(517) 223-9154

February 26, 1985

Mr. Ronald Kolzow
U.S.E.P.A.
Region V
230 South Dearborn
Chicago, Ill. 60604

Dear Mr. Kolzow:

Enclosed is a copy of the analysis of the samples taken on January 15, 1985. These samples were analyzed for the elements as required in the revised groundwater assessment plan.

I have also forwarded a copy to the Michigan Hazardous Waste Department for their files and to keep them current as to progress of the groundwater monitoring program at this facility.

Should you have any questions or comments please contact me. (517) 223-9154.

Sincerely,

A. M. Stock
Mgr. of Plant Eng./Envir. Cntrl.

AMS/alk

Enc.

5HW-13

DEC 5 1984

Mr. Richard Ayers
Group Vice-President
The Stanley Works
1309 Corbin Avenue
New Britain, Connecticut 06050

Re: Notice of Deficiency
Fowlerville, Michigan Facility
MID099124299

Dear Mr. Ayers:

The United States Environmental Protection Agency (U.S. EPA) has completed an initial review of the surface impoundment and groundwater information portions of your Part B application, submitted September 28, 1984, for a permit to be issued under the authority of Section 3005 of the Resource Conservation and Recovery Act (RCRA), as amended. Pursuant to 40 CFR Parts 270.10 and 270.11 this review was conducted to check for completeness of your application against a list of required information found in 40 CFR Part 270.13, 270.14 and 270.17.

The U.S. EPA has found your application to be incomplete due to deficiencies in several areas with further clarification and/or supplemental information being needed to continue a technical review. You are to provide all requested information in quadruplicate in order to complete your application. You will be notified that the application is complete after you have corrected the deficiencies described in the enclosure to this letter. The due date for the submittal of this information is January 25, 1985, however, you are encouraged to submit this information at your earliest convenience.

The U.S. EPA intends to work cooperatively with the Michigan Department of Natural Resources (MDNR) in processing your permit application. Should the MDNR become authorized to permit treatment and storage facilities during the processing period, the MDNR will make the final determination on your application. A copy of the Part B application has been sent to the MDNR, and a copy of your response will also be sent to them.

223-52

The U.S. EPA is committed to conducting the RCRA permitting process as promptly and efficiently as possible. Please feel free to contact Mr. Richard Traub of my staff at (312) 886-6138, if you have any questions regarding the initial review and the permitting process.

Sincerely,

ORIGINAL SIGNED BY
WILLIAM H. MINER

William H. Miner, Chief
Technical, Permits and Compliance Section

Enclosure

cc: Alan J. Howard, MDNR
w/enclosure

bcc: Joe Boyle

5
HW-13:RTRAUB:ssmith:11/30/84

ap 12-3-84 (R)mm 12/5/84

INITIALS / DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMEB CHIEF	WMD DIRECTOR
	RS 11-30-84	R.Traub 12/3/84			MEY 12/4/84	W 12/5/84		

Enclosure

1. Show on the topographic map the current 100 yr. floodplain or flood hazard area, location of uppermost aquifer and direction(s) of groundwater flow.

2. Provide information pertaining to floodplains as required by 270.14(b)(11)(B)(iii), (iv) and (v).

3. Provide specific identification and a detailed description of the uppermost aquifer and any underlying hydraulically connected aquifers. Included should be:

    A. A description of the regional geologic and hydrogeologic characteristics in the vicinity of the facility;

    B. A classification of the hydrogeologic units from the unit below the uppermost aquifer to the surface;

    C. Delineation of the areal and vertical extent of these units, include maps and cross-sections;

    D. The hydrologic properties associated with each unit, include dispersivity and retardation factors;

    E. Determinations of groundwater gradients, flow rates and directions through the units.

    Also describe how the above information was obtained or determined.

4. Provide written certification by a qualified engineer attesting to the structural integrity of all dikes as required by 40 CFR 270.17(e) and in accordance with 264.226(c).

5. Provide a demonstration that the dikes are designed, constructed and maintained to minimize erosion and prevent failure due to excessive erosion. Also, describe procedures for correcting erosion problems.

6. Provide a description of methods, results and calculations of dike stability analyses for foundation bearing capacity failure, seepage induced failure and slope failures. Minimum factors of safety should be calculated for steady state seepage, rapid drawdown and seismic conditions.

7. Provide a description of wastes previously handled at the facility 270.14(c)(7)(i).

8. Determine background ground water quality. Provide documentation that such determinations were made in accordance with 264.97 and that these values are expressed in the form necessary to determine statistically significant increases per 264.99(c)(3)(ii).

9. Propose concentration limits for each hazardous constituent to be monitored for, based on criteria set forth in 264.94(a) including a justification for any alternate concentration limits.

10. Describe in detail how the monitoring wells to be used are designed and constructed and how the groundwater monitoring system complies with 264.97(a), (b) and (c).

11. Provide a description of procedures used and to be used to measure groundwater elevations.

12. Detail what statistical procedures will be used in the proposed groundwater program in accordance with 264.99(h).

13. Provide documentation that monitoring at the compliance point will be quarterly for the entire compliance period, and that concentrations of parameters will be expressed in a form necessary to determine statistically significant increases as per 264.99(a).

14. Provide documentation that Appendix VIII constituents from Part 261 will be analyzed annually as per 264.99(f).

15. Specify procedure for annual determination of uppermost aquifer flow rate and direction as per 264.99(e).

16. Submit an engineering feasibility plan for a corrective action program necessary to meet the requirements of 264.100 as required by 270.14(c)(7).

17. Provide a copy of the chain-of-custody form referred to on page E-31.

18. Provide information as to how it will be determined that all contaminated subsoils will be completely removed upon closure pursuant to 264.228(a)(1) and 270.17(g).

In submitting your response, please provide numbered, amended, or additional pages to be inserted into your original Part B. The cover letter should also indicate directions on which original pages, maps, tables, or drawings are to be removed, and/or replaced. Certification must be provided for this information as required by 270.11 and 270.14(a).

JUN 28 1984

5HW-13

Mr. A. M. Stock
Stanley Tools Division
425 Frank Street
P.O. Box 829
Fowlerville, Michigan 48836

Dear Mr. Stock:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Stanley Tools Division, Fowlerville Plant's modified Groundwater Quality Assessment Plan dated June 15, 1984. The revised Plan adequately addresses the requirements of 40 CFR 265.93(d)(4) as well as U.S. EPA's concerns as discussed with you on June 13, 1984.

It is our understanding that implementation of the Plan will begin during the week of June 24, 1984.

If you have further questions, please feel free to contact me at (312) 886-5145.

Sincerely,

RK 6-27-84

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD
INITIALS	AP	RK			WEM			
DATE	6-26-84	6-28-84			6/28/84			

Ronald Kolzow
Environmental Protection Specialist

cc: George Henry, Jr.
Keck Consulting Services, Inc.
1099 W. Grand River
Williamston, MI. 48895

Dee Yarema
Stanley Laboratory
1309 Corbin Avenue
New Britain, Connecticut 06053

5HW-13:RKOLZOW:ssmith:6/26/84

KECK consulting services, inc.
1099 W. GRAND RIVER · WILLIAMSTON, MI 48895 · (517) 655-4391

June 7, 1984

Mr. Ronald Kolzow
U. S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Re: 5HW-13
Stanley Tools
Fowlerville, Michigan

Dear Mr. Kolzow:

In light of recent communications with your office we would like to propose modifications to the Groundwater Quality Assessment Program prepared by our firm on August 16, 1983 for the Stanley Tools facilities in Fowlerville, Michigan. An outline of the modified groundwater quality assessment plan is attached and supersedes the previous outline contained as Appendix A of the August 16, 1983 report.

The referenced plan provided for an expanded monitoring system and quarterly evaluation of parameters indicating groundwater contamination as specified in CFR 40, Paragraph 262.92 (b) (3). We propose to return to the original array of monitor wells for future sampling consisting of MW-7 (up-gradient) and MW's -5, -10 and -12 (all down-gradient). Since the sampled aquifer discharges directly into the Red Cedar River on site the original monitor system will be expanded to incorporate upstream and downstream sampling locations within the adjacent river. These surface water sampling locations will provide information concerning the impact of the discharge of any contaminated groundwater to the river from the site.

In lieu of the "indicator" parameters we propose to test each sample for hazardous wastes or hazardous waste constituents managed by the facility. These parameters have been identified as:

a. Copper (Michigan hazardous constituent)
b. Nickel
c. Zinc (Michigan Hazardous constituent)
d. Chromium (Hexavalent)
e. Cyanide (Complexed)
f. Cadmium

Sample collection, preservation and chain of custody will be conducted as set forth in the Groundwater Monitoring Plan submitted to EPA Region V by Stanley Tools Division on November 19, 1981. Testing methodology will conform to Standard Methods, as set forth by APHA, AWWA and WPCF.

Samples will be collected on a quarterly basis commencing within 30 days of receiving written approval from the EPA of our revised plan. As soon as technically feasible the concentrations of the identified hazardous wastes will be determined as well as the rate and extent of migration of the chemicals. Within 15 days of the determination a report will be sent to the EPA Regional Administrator detailing the findings.

If, as a result of the first quarter testing, it is determined that hazardous wastes from the facility have entered the groundwater the sampling, testing and reporting procedures will continue on a quarterly basis until final closure of the facility. Prior to March 1 of each year of sampling a report will be forwarded to the Regional Administrator concerning water quality results and the rate and extent of migration of hazardous wastes.

Similarly, if it is determined from the first quarter sampling results that hazardous wastes from the facility are not entering groundwater the indicator evaluation program described in Paragraph 265.92 and 265.93 (b) will be reinstated. The Regional Administrator will be notified of this action in the report required by Paragraph 265.93 (d) (5).

Please review the proposed modifications to Stanley Tools Division's groundwater assessment program. Should the changes meet your approval please provide written notification of your concurrence.

Should questions arise, please contact this office at your convenience.

Sincerely,

KECK CONSULTING SERVICES, INC.

George Henry Jr.

George Henry, Jr.
Certified Professional Geologist

GH/de

Appendix A (revised 6/6/84)
Groundwater Quality Assessment Plan - Outline
Stanley Tools Division
Fowlerville, Michigan

I. Expand monitoring system (4 wells plus 2 surface sources)

A. Continue to use four existing monitor wells
MW-7 (up-gradient)
MW's -5, -10 and -12 (down-gradient)

B. Add upstream and downstream surface water sampling locations along Red Cedar River

- also install staff gauge along river for comparison with groundwater levels

II. Collect water samples and measure water levels

A. Collect water samples on a quarterly basis from the six sources

- sample collection, preservation and chain of custody in accordance with Groundwater Monitoring Plan submitted to EPA Region V on November 19, 1981

B. Measure water levels at time of sampling

- wells and surface sources to within 0.01 feet

III. Analyze quarterly water samples for the following hazardous wastes managed by the facility:

A. Copper

B. Nickel

C. Zinc

D. Chromium (hexavalent)

E. Cyanide (complexed)

F. Cadmium

- testing methodology will conform to APHA, AWWA and WPCF Standard Methods

IV. Prepare written report of water quality results for EPA Regional Administrator following technical review of first quarters results

A. Report due within 15 days of completion of technical review

B. If hazardous wastes are detected in groundwater continue to sample for hazardous wastes on a quarterly schedule

   - annually, and prior to March 1, a report will be prepared and submitted to EPA Regional Administrator concerning concentrations of hazardous wastes in the groundwater and an assessment of the rate and extent of migration

C. If hazardous wastes are not detected in the first quarterly samples return to the indicator evaluation program specified by Paragraph 265.92 and Paragraph 265.93 (b)

   - Notify the Regional Administrator in report required by Paragraph 265.93 (d) (5)

KECK consulting services, inc.
1099 W. GRAND RIVER · WILLIAMSTON, MI 48895 · (517) 655-4391

May 7, 1984

Mr. Ronald Kolzow
U. S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

MID 099 124 299 G, TRS, TSD, PA

Re: 5HW-13
Stanley Tools
Fowlerville, Michigan

Dear Mr. Kolzow:

In response to your letter of April 10, 1984 we propose to modify our groundwater assessment program submitted August 17, 1983 and February 7, 1984 in order to rectify the deficiencies that you have noted. Our proposed efforts will be directed toward identifying any hazardous waste parameters that may be responsible for the groundwater contamination observed during our quarterly monitoring. We will also endeavor to identify any hazardous wastes or hazardous waste constituents stored in the four, existing surface impoundments. Specifically, Stanley Tools or their authorized representatives will:

1. Return to the original four monitor well network comprising well 7 (upgradient) and wells 5, 10 and 12 downgradient. Samples will also continue to be collected from sources upstream and downstream within the adjacent Red Cedar River. Water samples will be collected and analyzed on a quarterly basis.

2. Samples from monitor wells 5, 7 and 10 will be tested for the following chemical parameters:

letter was approved

   a. 1-1 Dichloroethane

   b. Trans 1-2 Dichloroethylene

   c. Trichloroethene

   d. Vinyl Chloride

   e. 2-4 Dimethylphenol

   f. BIS (2 Ethylhexyl) Phthalate

3. The sample from MW-12 will be submitted to a GC/MS scan in order to identify hazardous wastes or constituents.

4. Two samples will be collected from each of the four existing surface impoundments and tested for the six constituents listed in item 2 above as well as any parameters identified from the GC/MS scan of MW-12.

5. An undisturbed, split spoon soil sample will be collected from an area near MW-5 and tested for the six parameters listed in item 2 above.

6. An undisturbed, split spoon soil sample will be collected from an auger boring drilled near MW-12, the Chemfix area, and evaluated for the parameters identified from the GC/MS scan of MW-12.

7. Samples will be collected upstream and downstream on the Red Cedar River and analyzed for the six compounds identified in MW-5 and any compounds evidenced in the GC/MS scan of the sample from MW-12.

Please review the modifications to our groundwater assessment program and provide written notification as to your concurrence or any other change you would like to see instituted.

Sincerely,

KECK CONSULTING SERVICES, INC.

George Henry Jr.

George Henry, Jr.
Certified Professional Geologist

GH/de

cc: Mike Stock
Delia Yarema
Barbara Bush

APR 10 1984

5HW-13

Albert M. Stock, Manager
Stanley Tools
Plant Engineering/Environmental Control
425 Frank Street
P.O. Box 829
Fowlerville, Michigan 48836

RE: Letter of Warning
MID 099-124-299

Dear Mr. Stock:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Stanley Tools Division Fowlerville Plant's Groundwater Quality Assessment Plan and the first quarter results of the groundwater assessment program, submitted August 17, 1983, and February 7, 1984, respectively. This review indicates that in its present form, it is likely that the groundwater quality assessment will not satisfy the regulatory requirements.

On the basis of these submissions to this Agency, the following deficiencies in the Groundwater Quality Assessment Plan have been identified:

1. Failure to specify sampling and analytical methods for those hazardous wastes or hazardous waste constituents in the surface impoundments as required by 40 CFR 265.93(d)(3)(ii); and

2. Failure to describe a groundwater quality assessment program capable of determining (a) the rate and extent of migration of the hazardous waste or hazardous waste constituents in the groundwater, and (b) the concentration of hazardous waste or hazardous waste constituents in the groundwater.

Hazardous waste constituents, as defined in 40 CFR 260.10, are those constituents associated with the hazardous wastes which have been treated, stored or disposed of at your facility. Hazardous waste, as defined in 40 CFR 261.3, are identified in Subpart D of Part 261.

Please inform me, within 30 days of the receipt of this letter, what steps Stanley Tools will take to resolve these deficiencies.

If you have further questions, please feel free to contact Ronald Kolzow of my staff at (312) 886-5145.

Sincerely yours,

ORIGINAL SIGNED BY.
WILLIAM H. MINER

William H. Miner, Chief
Technical, Permits, and Compliance Section
Waste Management Branch

cc: George Henry, Jr.
Keck Consulting Service, Inc.

Alan J. Howard
Michigan Department of Natural Resources

bcc: Joe Boyle
Michigan SIO

5HW-13:RKolzow:PG:4-4-84

INITIALS / DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
	PK 4-5-84	RK 4-9-84			4/9/84	4/9/84		

Emr 4/9/84

STANLEY

S T A N L E Y T O O L S

DIVISION OF THE STANLEY WORKS
425 FRANK STREET, P. O. BOX 829, FOWLERVILLE, MICHIGAN 48836
(517) 223-9154

August 17, 1983

RECEIVED
AUG 24 1983
WASTE MANAGEMENT BRANCH

Mr. Valdas Adamkus
EPA Region V
230 South Dearborn
Chicago, Ill. 60604

MID 099124299
PA, GI TRS, TSD

Dear Mr. Adamkus:

Enclosed is a copy of Stanley Tools Division Fowlerville Plant's Ground Water Quality Assessment Plan which was referred to in our letter of August 4, 1983 to you.

This plan was prepared for Stanley Tools Division by Keck Consultants located in Williamston, Michigan who are certified in the field of geology.

As stated in the plan we are prepared to implement the Groundwater Quality Assessment Plan in October 1983, however, we would ask, if possible, to have Region V EPA review and we trust approve the plan prior to the October 1983 date. Should a reply not be forthcoming from the E.P.A., it is Stanley Tools Division intentions to comply to the October 1983 implementation date.

Sincerely,

STANLEY TOOLS DIVISION
FOWLERVILLE PLANT

A. M. Stock
Mgr. of Plt. Eng. & Envir. Control
/alk

Enc.

RECEIVED
8/29/83

STANLEY

THE STANLEY WORKS

Since 1843

P.O. Box 1800
NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

G, T, TSD, PA

August 4, 1983

Mr. Valdas Adamkus
EPA Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Mr. Adamkus:

As required by Title 40 CFR 265.93 (d) (1), I am notifying you that the Stanley Tools facility located in Fowlerville, Michigan (EPA ID #MID099124299) may be affecting groundwater quality.

This facility is developing a Groundwater Quality Assessment Plan with Keck Consulting Services of East Lansing, Michigan as required by Title 40 CFR 265.93 (d) (2). We will submit a plan to you prior to August 18, 1983.

Sincerely,

THE STANLEY WORKS

Richard H. Ayers

Richard H. Ayers
Group Vice President

RECEIVED
AUG 10 1983
WASTE MANAGEMENT
BRANCH

jzz

RECEIVED
8/12/83

5HW-TUB

MAY 0 5 1982

Mr. A. M. Stock, Manager
Plant Engineering/Environmental
Control
Stanley Tools
425 Frank Street
Fowlerville, Michigan 48836

no cert. on file

RE: MID099124299

Dear Mr. Stock:

Thank you for your January 20, 1982, letter in which you enclosed a copy of the alternate groundwater monitoring plan for your facility in Fowlerville, Michigan.

The alternate groundwater monitoring plan that you submitted for your facility has been evaluated with respect to the requirements of 40 CFR 265.91(d)(1-5). Our comments regarding this review are listed below:

1. Alternate groundwater monitoring plans should have been submitted to the Regional Administrator by November 19, 1981, [see 40 CFR 265.91(d)(1)]. The Stanley Tool alternate groundwater monitoring plan was received on January 26, 1982.

2. The submitted plan does not indicate the depth of the groundwater monitoring wells at the facility [see 265.93(d)(3)(i)].

3. Within 15 days after making the initial determinations required by 40 CFR 265.93(d)(4) (i.e. not later than 15 days after November 19, 1981) a written report containing an assessment of groundwater quality at the facility should have been submitted to the Regional Administrator. To date, no such report has been received.

4. Stanley Tool proposes to monitor quarterly for the parameters listed in Section 3.1, Group I on page 5 of the alternate groundwater monitoring plan for only the first year of sampling. Federal regulations (40 CFR 265.90(d)(4)) require quarterly analysis of groundwater samples for those hazardous wastes or hazardous waste constituents in the facility. These analyses must be made until final closure of the facility.

In light of the above, we have determined that your alternate groundwater monitoring plan does not satisfy the regulatory requirements of 40 CFR 265.91(d)(1-5).

Therefore, the hazardous waste regulations require your facility to install, operate and maintain a groundwater monitoring system which meets the requirements of 40 CFR 265.91 through 40 CFR 265.94.

If you require additional information please contact Mr. James Brossman, of my staff at (312) 353-2197, or the above address.

Sincerely,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Attachment

J. BROSSMAN:gigi:5HW-TUB:6-7444:4/21/82

	TYPIST	AUTHOR				AHMD DIRECTOR
INITIALS	gigi	JB		KW		KKK
DATE	4/30/82	4/30/82		5/3/82	5/4/82	5/4/82

Orig. 5/4/82 D65/4/83